

FILED ENTERED  
LODGED RECEIVED

OCT 17 2013

UNITED STATES DISTRICT COURT

DISTRICT OF MARYLAND

AT BALTIMORE  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

WATSON PATRICK BRUCE

CASE NUMBER:

13-2473TJS

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

(1) On or around May 23, 2012 through October 17, 2012 in the District of Maryland, the defendant:

Violated 21 U.S.C. 841 (a)(1), Distribution and Possession with the Intent to Distribute a Controlled Dangerous Substance, Cocaine Base (Crack).

I further state that I am the arresting officer, and that this complaint is based on the following facts:

On or about May 23, 2012 through October 17, 2012, within the District of Maryland, the defendant did Possess with the Intent to Distribute a Controlled Dangerous Substance, to wit: Cocaine Base (Crack), in violation of Title 21 U.S.C. 841 (a)(1)

See attached affidavit.

  
S/A Stephen Krukar

Sworn to before me and subscribed in my presence,

October 17, 2013 2:40 pm  
at Baltimore, Maryland  
Date and Time Issued

Honorable Timothy J. Sullivan  
U.S. Magistrate Judge

  
Signature of Judicial Officer

**AFFIDAVIT**

1. I, Stephen P. Krukar, Special Agent, Drug Enforcement Administration ("DEA"), being duly sworn, depose and state as follows:

2. I am a Special Agent with the DEA, currently assigned to the Washington Division Office. I have been employed with the DEA as a Special Agent for over 17 years. During this period, I have authored and participated in the execution of numerous arrest and search warrants for drug-related violations. I have also received specialized training in drug investigations and identification as well as in the laws of search and seizure. I have participated in numerous criminal investigations and have trained and participated in the preparation, service and execution of criminal complaints, arrests, and search warrants. For the purpose of applying for this criminal complaint and arrest warrant, I am a federal law enforcement officer under the applicable provisions of the United States Code and under Rule 41(a) of the Federal Rules of Criminal Procedure.

3. The information set forth in this Affidavit is known to me as a result of an investigation personally conducted by me and by other law enforcement agents and officers.

4. This Affidavit is being submitted for the limited purpose of supporting an application for a criminal complaint. Thus, I have not set forth each and every fact learned during the course of the investigation. This Affidavit is respectfully submitted in support of an application for the issuance of a criminal complaint for Watson BRUCE.

5. The facts and circumstances set forth below in this Affidavit demonstrate that there is probable cause to believe that BRUCE has committed the offense of possession with intent to distribute 28 grams or more of cocaine base (crack), in violation of 21 U.S.C. § 841(a).

**FACTS SUPPORTING PROBABLE CAUSE**

6. In May 2012 DEA Task Force Group 34 received information from a past proven reliable DEA Confidential Source (CS) that a person known to the CS as "Tree" (later identified as Watson BRUCE) was selling heroin and crack cocaine in the area of Annapolis, Maryland. The CS stated that BRUCE drives an older model beige Lincoln bearing Maryland tag 2AM4488 and uses the cellphone number 443-482-4806. Subsequently, the CS identified a driver's license photograph of BRUCE as "Tree."

7. On or about May 23, 2012, plans were formulated for the CS and an undercover DEA Task Force Officer (UC) to conduct an undercover purchase of crack cocaine from BRUCE in Annapolis, Maryland. On the same date, the CS called BRUCE and ordered a quantity of crack cocaine from BRUCE. The CS and BRUCE agreed to meet later that day to conduct the transaction. Later on the same date, at approximately 1:55 pm, agents and officers established pre-buy surveillance at the Shell gas station located at 2575 Riva Road, Annapolis, Maryland. At approximately 2:03 pm, DEA Group Supervisor (G/S) Patrick Musselman observed BRUCE arrive at the aforementioned location in the beige Lincoln Towncar and exit the vehicle. Shortly thereafter, G/S Musselman observed the CS, UC and BRUCE walk into the Shell gas station. Once inside the Shell gas station, the CS introduced the UC to BRUCE as a prospective crack cocaine customer. During the meeting, the UC purchased from BRUCE cocaine base (crack) having a net weight of 2.8 grams with \$300 in official government funds. The transaction was audio recorded. The UC confirmed BRUCE's identity from a Maryland driver's license photo.

8. On or about May 31, 2012, plans were formulated to conduct an undercover purchase of crack cocaine from BRUCE in Annapolis, Maryland. On the same date, the UC

13-2473-JS

called BRUCE and ordered a quantity of crack cocaine from BRUCE. The UC and BRUCE agreed to meet later that day to conduct the transaction. On the same date, at approximately 11:58 am, agents and officers established pre-buy surveillance at the Shell gas station located at 2575 Riva Road, Annapolis, Maryland. At approximately 12:26 pm, Special Agent (S/A) Peter Ott observed BRUCE arrive at the aforementioned location in the beige Lincoln Towncar and exit the vehicle. Shortly thereafter, S/A Ott observed the UC and BRUCE walk into the Shell gas station. Once inside the Shell gas station, the UC purchased from BRUCE cocaine base (crack) having a net weight of 8.8 grams with \$300 in official government funds. The transaction was audio recorded.

9. On or about June 27, 2012, plans were formulated to conduct an undercover purchase of crack cocaine from BRUCE in Annapolis, Maryland. Later on the same date, the UC called BRUCE and ordered a quantity of crack cocaine from BRUCE. The UC and BRUCE agreed to meet later that day to conduct the transaction. On the same date, at approximately 1:14 pm, agents and officers established pre-buy surveillance at the Shell gas station located at 2575 Riva Road, Annapolis, Maryland. At approximately 1:37 pm, your affiant observed BRUCE arrive at the aforementioned location in the beige Lincoln Towncar and exit the vehicle. Shortly thereafter, your affiant observed the UC and BRUCE walk into the Shell gas station. Once inside the Shell gas station, the UC purchased from BRUCE cocaine base (crack) having a net weight of 8.5 grams with \$600 in official government funds. The transaction was audio recorded.

10. On or about July 25, 2012, plans were formulated to conduct an undercover purchase of crack cocaine from BRUCE in Annapolis, Maryland. Later on the same date, the UC called BRUCE and ordered a quantity of crack cocaine from BRUCE. The UC and BRUCE

13-2473-TJS

agreed to meet later that day to conduct the transaction. At approximately 11:50 am, agents and officers established pre-buy surveillance at the Shell gas station located at 2575 Riva Road, Annapolis, Maryland. At approximately 1:05 pm, G/S Musselman observed BRUCE arrive at the aforementioned location in the beige Lincoln Towncar and exit the vehicle. Shortly thereafter, G/S Musselman observed the UC and BRUCE walk into the Shell gas station. Once inside the Shell gas station, the UC purchased from BRUCE cocaine base (crack) having a net weight of 13.4 grams with \$600 in official government funds. The transaction was audio recorded.

11. On or about October 17, 2012, plans were formulated to conduct an undercover purchase of crack cocaine from BRUCE Annapolis, Maryland. On the same date, at approximately 11:28 am, the UC called BRUCE and ordered a quantity of crack cocaine from BRUCE. The UC and BRUCE agreed to meet later that day to conduct the transaction. At approximately 12:44 pm, agents and officers established pre-buy surveillance at the Shell gas station located at 2575 Riva Road, Annapolis, Maryland. At approximately 1:07 pm, G/S Musselman observed BRUCE arrive at the aforementioned location in the beige Lincoln Towncar and exit the vehicle. Shortly thereafter, G/S Musselman observed the UC and BRUCE walk into the Shell gas station. Once inside the Shell gas station, the UC purchased from BRUCE cocaine base (crack) having a net weight of 16.9 grams with \$650 in official government funds. The transaction was audio recorded.


#### CONCLUSION

12. All of the cocaine base samples mentioned in this Affidavit were submitted to the DEA Mid-Atlantic Lab for analysis, and all were confirmed to be cocaine base (crack). Based on the facts set forth above, your affiant submits respectfully that there is probable

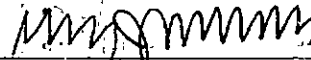
13-2473TJS

cause to establish that BRUCE has committed the offense of possession with intent to distribute cocaine base, in violation of 21 U.S.C. § 841(a). Your affiant respectfully requests that a criminal complaint and arrest warrant be issued, as prayed.

FURTHER YOUR AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Stephen P. Krukar  
Special Agent  
Drug Enforcement Administration

Sworn and subscribed to this 17<sup>th</sup> day of October 2013.

  
\_\_\_\_\_  
Timothy J. Sullivan  
United States Magistrate Judge  
District of Maryland